

William B. Niese, OSB #081087
Edward Johnson, OSB #965737
Emily Teplin Fox, OSB #121720

bniese@oregonlawcenter.org

ejohnson@oregonlawcenter.org

efox@oregonlawcenter.org

OREGON LAW CENTER

455 S. 4th Street, Suite 5

PO Box 1098

Coos Bay, OR 97420

Phone: (541) 269-2616 x 202

Fax: (541) 269-1372

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

KERRY CLARK,

Plaintiff,

vs.

MICHAEL MAFFEI, in his personal and
official capacities; **RHETT DAVIS**, in his
official capacity; **DENYCE SHORB**;
HARVEY MAFFEI,

Defendants.

Case No.: 16-CV-00033-JR

**DECLARATION OF WILLIAM
NIESE**

**In support of Plaintiff's Motion for
Partial Summary Judgment**

I, WILLIAM NIESE, hereby declare:

1. I am one of the attorneys for plaintiff Kerry Clark in this case.

//

//

//

//

2. Attached are true and correct copies of the following documents:

Exhibit No.	Depo. Exhibit No.	Description
1		Selections from the deposition of Denyce Shorb of June 22, 2017
2		Selections from the deposition of Michael Maffei of June 22, 2017
3		Selections from the deposition of Angela Armstrong of November 14, 2017
4		Selections from the deposition of Rhett Davis of June 22, 2017
5		Selections from the deposition of Harvey Maffei, November 11, 2017
6		Selections from the deposition of Trisina Vinson, November 14, 2017
7	1	Lease agreement between Kerry Clark, Denyce Shorb, and William Maffei
8	5	Notice of July 6, 2016 by Denyce Shorb
9		Document Entitled Powers Police Policy on Landlord/Tenant Disputes Produced by Rhett Davis Bates Stamped M/D 000030-000032)
10		Verizon Phone Records Produced by Michael Maffei bates stamped (000149-000157)
11	3	Sales Agreement for 460 Poplar
12	2	Eviction Notice

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED this 2nd day of February, 2018.

By: s/ William B. Niese
William B. Niese

Of Attorney for Plaintiff